Case 17-40832 Doc 12 Filed 10/20/17 Entered 10/20/17 13:26:27 Desc Main Document Page 1 of 2

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF GEORGIA

In re: : BANKRUPTCY CASE

GLENDA L. SHANNON : NO. 17-40832-JTL

:

Debtor : CHAPTER 7

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# TRUSTEE'S MOTION FOR PRODUCTION OF DOCUMENTS UNDER BANKRUPTCY RULE 2004

COMES NOW WALTER W. KELLEY, Trustee in the above case, and shows the following:

-1-

Walter W. Kelley is the Trustee in this case and is responsible for investigating the financial affairs of the Debtor(s).

-2-

The Trustee requires the Court's authority to obtain documents and records from the Debtor(s), from creditors and from third parties who have custody of records relating to the Debtor's(s') financial affairs. These documents include the Debtor's(s') bank and financial account statements, deposit records, cancelled checks, records of the Debtor's(s') payments to creditors, credit card applications, promissory notes, loan documents, security agreements, security deeds, financing statements, loan/credit applications, appraisals of the Debtor's(s') property, credit reports, motor vehicle records and other records describing the Debtor's(s') financial affairs.

-3-

The Trustee requests entry of an order that will allow him to obtain the above-described records from the Debtor(s), from creditors and from third parties via subpoena, if necessary.

#### WHEREFORE, MOVANT PRAYS:

(a) That this court enter an order authorizing the Trustee to obtain by subpoena the above-described documents and records from the Debtor(s), from creditors and from third parties who have custody of such records; and

# Case 17-40832 Doc 12 Filed 10/20/17 Entered 10/20/17 13:26:27 Desc Main Document Page 2 of 2

(b) For such other and further relief as it deems just and proper.

/s/ Walter W. Kelley
WALTER W. KELLEY
Chapter 7 Trustee
Kelley, Lovett, Blakey & Sanders
P.O. Box 70879
Albany, GA 31708
(229) 888-9128
State Bar No. 412337
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#### **CERTIFICATE OF SERVICE**

I certify that the following parties have been served with the Trustee's Motion for Production of Documents Under Bankruptcy Rule 2004. Those not served by electronic means by the Court's electronic filing system were served by U. S. Mail or electronic mail.

Glenda L. Shannon 5759 Lexington Drive Columbus, GA 31907

AMERICA A. CROSS ATTORNEY FOR DEBTOR WAREY@AOL.COM

ELIZABETH A. HARDY ASST. U. S. TRUSTEE Ustp.region21.mc.ecf@usdoj.gov

This 20th day of OCTOBER 2017

/s/ Walter W. Kelley WALTER W. KELLEY